

1 **SAMPSON & ASSOCIATES**
 2 Bryan D. Sampson, Esq. (#143143)
 2 Mary L. Fickel, Esq. (#221872)
 3 2139 First Avenue
 3 San Diego, California 92101
 4 Tel. (619) 557-9420 / Fax (619) 557-9425
 4 bsampson@sampsonlaw.net

5 Attorneys for Plaintiff/Judgment Creditor
 6 AIRLINES REPORTING CORPORATION
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8 **UNITED STATES DISTRICT COURT**
 9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 AIRLINES REPORTING CORPORATION,

11 Plaintiff/Judgment Creditor,

12 v.

13 COMMERCIAL TRAVEL CORPORATION
 14 d/b/a MATLOCK TRAVEL, et al.,

15 Defendants/Judgment Debtors.

Case No. 08-MC-00088

DECLARATION OF DEBORAH ERICKSON IN OPPOSITION TO MOTION TO VACATE JUDGMENT

Date: July 25, 2008

Time: 10:00 a.m.

Ctrm: 1, 4th Floor

Judge: Hon. Irma E. Gonzalez

16 I, Deborah Erickson, declare:

17 1. I am currently Manager, Risk Analysis, for Plaintiff, Airlines Reporting Corporation,
 18 (hereinafter Plaintiff "ARC"), a Delaware corporation with its principal place of business in Arlington,
 19 Virginia. I have been employed by Plaintiff ARC for over 31 years and am readily familiar with
 20 ARC's standard practices and procedures. I am also the person who has custody of the records and has
 21 specific knowledge of the account with Defendant Commercial Travel Corporation and the unrelated
 22 account Plaintiff ARC had with Uniglobe Fairway Travel.

23 2. If called upon to testify, I could and would competently testify to the matters contained
 24 herein based upon my personal knowledge, except as to those matters stated on information and belief,
 25 and as to those matters I am informed and believe thereon allege that they are true and correct based
 26 upon my reasonable investigation.

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Factual Background

3. Plaintiff ARC serves as a national clearinghouse for issuing standardized blank ticket stock documents and other standardized forms ("ARC traffic documents") to ARC accredited travel agents to be used as air passenger tickets by the travel agents' customers. ARC maintains an agency list of persons and entities accredited to serve as travel agents and to issue ARC traffic documents.

4. It is Plaintiff ARC's regular practice to enter into Agent Reporting Agreements ("ARA") with the travel agent entities that are accredited to issue ARC traffic documents. The ARA governs the issuance of ARC traffic documents.

5. Each travel agent entity must undergo a separate accreditation process, which includes an inquiry regarding the financial and criminal background of the principals/owners and key employees of the travel agent entity, including an inquiry regarding conviction for financial crimes. If revealed, a criminal history for a principal/owner of an entity may preclude the entities' accreditation or approval of a change of ownership application.

6. The facts and circumstances of Defendant's involvement in the UniGlobe matter differ significantly from the facts and circumstances of this case. The facts and circumstances that differentiate the two matters include, among others, the following:

A.R.C. v. UniGlobe

Agent Bank information: Grossmont Bank
Different debt obligations to Plaintiff:
Debt
Unreported Sales: \$1,379.00
Dishonored Drafts: \$1,112,394.21
Chargebacks: \$4,336.50
Misc. Charge Orders: \$260.51

Uniglobe Accreditation No.: 05577191

Date of approved accreditation:
5/10/83

A.R.C. v. Commercial Travel

Agent Bank information: US Bank

Different debt obligations to Plaintiff: Debt

*Unreported Sales: \$1,462.31
Dishonored Drafts: \$682,088.45
Chargebacks: \$18,023.65
Misc. Charges: \$368.40*

Matlock Accreditation No.: 2952114
Costa Travel Accreditation No.: 0565707

Dates of approved accreditation:
3/7/91 (Matlock Travel);
12/20/83 (Costa Travel)

7. Plaintiff ARC entered into a settlement agreement with third party Anthony Renda, in the Uniglobe case. To date, third party Anthony Renda has not fully and completely performed under the terms of the Uniglobe settlement agreement.

1 I declare under penalty of perjury under the laws of the United States of America and the State
2 of California that the foregoing is true and correct. This Declaration is executed this 14th day of July,
3 2008, in Arlington, Virginia.

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5 By: Deborah Erickson
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SAMPSON & ASSOCIATES
ATTORNEYS AT LAW
2139 FIRST AVENUE
SAN DIEGO, CALIFORNIA 92101
TELEPHONE (619)557-9420 - FACSIMILE (619)557-9425

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct. This Declaration is executed this 14th day of July, 2008, in Arlington, Virginia.

Deborah Erickson
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